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VIRGINIA  
MAKING

June 20, 2001

**VIA HAND DELIVERY**

Ms. Colleen Manning  
Federal Election Commission  
Reports Analysis Division  
Mail Room 824  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Ms. Manning:

I am counsel for the Amgen, Inc. Political Action Committee ("Amgen PAC"). This responds to your letter of April 25 regarding a potential excessive contribution relating to the Abraham Senate 2000 campaign. According to your letter, a total of \$6,000 was contributed from the Amgen PAC to the Abraham Senate Committee designated for the "general" election. The first of these disbursements was made on April 25, 1996, almost four years before the primary election occurred.

As we discussed on the telephone, at the time of the final contribution to the Abraham campaign (October 9, 2000), Amgen PAC officials were uncertain as to how the 1996 contribution had been designated because the officials did not have a copy of the FEC report covering that period. In addition, the current PAC officials were not employed by Amgen in 1996, so there was no direct knowledge on the part of Amgen officials with respect to the disbursement in 1996. When the Amgen PAC officials inquired as to their prior contributions to the Abraham Committee, they were assured by Abraham committee officials that the 1996 disbursement had been designated for the "primary." Based on those assertions, and the absence of any reliable records to dispute their assertions, the October 9 \$2,000 disbursement for the general election was approved.

Following receipt of your letter, we researched the Abraham Committee FEC reports to ascertain how they designated the April, 1996 disbursement. According to our research, their records also reflect that the 1996 contribution was for the "general" election. Accordingly, we have contacted the Abraham Committee and requested a \$1,000 refund to bring the aggregate

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contribution within the \$5,000 per election limitation. A copy of the letter to the Abraham Committee (without enclosures) is attached. As you can appreciate, the defeat of Senator Abraham, and his subsequent appointment to the Bush cabinet has made it very difficult to resolve this matter. We will keep you apprised of the status of our efforts to secure the refund.

Sincerely yours,



Timothy W. Jenkins

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Enclosures

cc: Rita Norton, Amgen, Inc. PAC Treasurer

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VJENKINS  
MACREP

June 20, 2001

Mr. Tony Antone  
Abraham Senate 2000 Committee  
39400 Woodward Avenue, Suite 250  
Bloomfield Hills, MI 48304-2876

Dear Mr. Antone:

I am counsel to the Amgen, Inc. Political Action Committee ("Amgen PAC"). As we discussed on the telephone, the Amgen PAC inadvertently made contributions in excess of the \$5,000 per contribution limit for the Abraham 2000 General Election. Attached for your information are copies of the itemized disbursement pages from the Amgen PAC detailing those disbursements.

As I related to you, Amgen officials did not have copies of their 1996 FEC report at the time they approved the October 9, 2000 disbursement for \$2,000. Based on discussions with the Abraham Committee in the weeks prior to the 2000 election, Amgen officials were led to believe by the Abraham Committee officials that the '96 disbursement had been designated for the primary, and therefore, that an additional \$2,000 contribution could be made to the Abraham General Election account. Based on those assertions, and because Amgen officials were unable to independently corroborate the designation, the final 2000 disbursement was approved.

The attached FEC letter and our research discloses that both the Amgen PAC and Abraham Committee designated the 1996 receipt for the general election, and therefore, it appears an unintentional excessive disbursement for the 2000 general election has been made. Accordingly, please remit, at your earliest convenience, a check in the amount of \$1,000 to the Amgen, Inc. PAC to bring the total in compliance with the \$5,000 per election limitation.

Thank you for your prompt attention to this matter. Please do not hesitate to contact me if you need additional information.

Sincerely yours,

  
Timothy W. Jenkins

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Enclosures

cc: Rita Norton, Amgen, Inc. PAC Treasurer

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

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